

UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF PENNSYLVANIA

Patrick J. Hughes, Esq.
Connell Foley LLP
85 Livingston Avenue
Roseland, New Jersey 07068
(973) 535-0500

Attorneys for Defendants Securitas, Pinkerton's, Burns, Dennis
Schuk and Judd Bach

NOEL GOULDSBROUGH,

Plaintiff,

v.

SECURITAS, AB, PINKERTON'S
INC., a SECURITAS COMPANY,
BURNS INTERNATIONAL SECURITY
SERVICES CO., DENNIS SCHUK,
JUDD BACH and JOSEPH KENNEDY,

Defendants.

Hon. William H. Yohn, Jr., U.S.D.J.

CIVIL ACTION NO.: 02-3222 (WHY)

**NOTICE OF DEFENDANTS' MOTION TO
ENFORCE THE AGREEMENT OF
PLAINTIFF GOULDSBROUGH TO
ARBITRATE HER CLAIMS**

TO: David L. Deratzian, Esq.
Hahalís & Kounoupis, P.C.
20 East Broad Street
Bethlehem, Pennsylvania 18018

COUNSELOR:

PLEASE TAKE NOTICE that defendants Securitas, AB,
Pinkerton's Inc., Burns International Security Services Co.,
Dennis Schuk and Judd Bach hereby move to enforce the agreement
of plaintiff, Noel Gouldsbrough, to arbitrate her claims against

defendants, pursuant to the Pre-Dispute Resolution Agreement she signed as a condition of her employment with Burns International Security Services Co.

PLEASE TAKE FURTHER NOTICE that in support of this motion, defendants will rely on the following:

1. Affidavit of Patrick J. Hughes, Esq. with attachments;
2. Brief in Support of Defendants' Motion; and
3. All other pleadings filed previously in this action.

Defendants request oral argument on this motion.

Respectfully submitted,

CONNELL FOLEY LLP
Attorneys for Defendants,
Securitas, AB, Pinkerton's Inc.,
Burns International Security
Services Co., Dennis Schuk and
Judd Bach

By: _____

PATRICK J. HUGHES

DATED: October 29, 2002